

**Federal Defenders
OF NEW YORK, INC.**

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MEMO ENDORSEMENT

February 24, 2023

FILED ON PACER/DELIVERED TO COURT VIA EMAIL

The Honorable Kenneth M. Karas
United States District Judge
Southern District of New York
300 Quarropas Street
White Plains, New York 10601

Re: *United States v. Anthony Delosangeles*, 16 Cr. 634 (VOSR)

Dear Judge Karas,

Defense counsel respectfully requests a one-week extension to file a responsive motion in this case (from March 3 to March 10). In turn, defense counsel requests that the government be granted one additional week to reply (from March 17 to March 24).

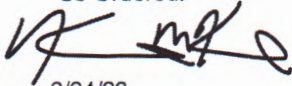
Mr. Delosangeles appeared before the Court on December 2, 2022 for arraignment on a supervised release violation. The petition alleged a misdemeanor third degree assault in Tarrytown, New York, on October 5, 2022. On December 14, 2022, New York State dismissed the charge. On January 11, 2023, the government announced its intent to proceed with the underlying violation and stated that it would not call the alleged victim to testify. The defense objected, citing due process concerns. The Court set a briefing schedule.

On February 17, 2023, the government filed its brief. Defense counsel's response is currently due on March 3, 2023. Defense counsel requests until March 10, 2023 to draft a thoughtful response and review the copious discovery referenced in the government's brief. If this request is granted, the government requests until March 24, 2023 to reply. The Court is currently scheduled to hear oral argument on April 27, 2023.

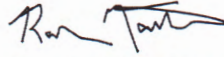
I have discussed these proposed extensions with Assistant United States Attorney Ben Arad. He has no objection.

Granted.

So Ordered.


2/24/23

Sincerely,



Rachel S. Martin
Assistant Federal Public Defender

cc: AUSA Ben Arad (via e-mail)